

EXHIBIT B

VIA TELECOPY AND FEDERAL EXPRESS

Jonathan Lieberman, Esq.
L. Londell McMillan PC
200 West 57th St., Suite 200
New York, N.Y. 10019

Re: Sick of it All "Dragon" Trademark Infringement

Dear Mr. Lieberman:

As we discussed, this firm represents the performing and recording group Sick of it All and their wholly owned corporation Bush Baby Zamagate, Inc. (collectively referenced herein as "SOIA"). SOIA is the owner of a trademark and service mark comprised of a stylized dragon design, which has continuously appeared on the band's recordings, merchandise and in advertising materials since at least as early 1987. SOIA is the owner of United States trademark application Serial Numbers 78/192,354 in International Class 9 for musical sound recordings and 78/192,351 in International Class 25 for various forms of clothing merchandise.

SOIA's dragon design trademark is well known and widely recognized throughout the United States and the rest of the world. As you are aware, SOIA has released numerous records upon which the dragon design mark has been prominently affixed through several labels including Revelation Records, Relativity Records (now owned by Sony), East/West and Fat Wreck Chords. The band has toured extensively throughout the United States and elsewhere throughout the world. The advertising and promotional materials for these shows have prominently featured the SOIA dragon design trademark. Millions of dollars of SOIA recordings and merchandise featuring the SOIA dragon design trademark have been sold. SOIA released its most recent album in August 2002 and is currently in the studio recording an album to be released later this year. A copy of the album cover of one of SOIA's recent releases featuring the dragon design trademark is attached hereto as Exhibit A.

SOIA just learned that Mobb Deep intends to utilize a virtually identical, and thus infringing, dragon design in connection with soon to be released sound recordings produced by Mobb Deep of the recording artist known as NOYD. A copy of the advertisement on which this is advertised is included as Exhibit B hereto. An insert included with the Mobb Deep album "Free Agents - The Murda Mix Tapes", which was released yesterday by Landspeed Records (LSR 922) contains an insert that utilizes a virtually identical dragon design to announce the forthcoming NOYD release.

Jonathan Lieberman, Esq.
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Based upon the virtually identical nature of the respective dragon designs and the identical nature of the goods and services in connection with which the respective marks are utilized, Mobb Deep's (and/or NOYD's and Landspeed's) use of the dragon design trademark has created a likelihood of confusion whereby consumers will mistakenly believe that Mobb Deep's (and/or NOYD's and Landspeed's) goods and services emanate from or are otherwise associated with, sponsored and/or approved by SOLA. The fact that Sick of it All and Mobb Deep have previously performed on a joint recording further lends to this confusion. The resulting confusion and dilution will irreparably harm SOLA's goodwill and reputation in the marketplace and will otherwise damage SOLA's business interests. Mobb Deep's and/or NOYD's and Landspeed's use of the dragon design amounts to common law trademark infringement and unfair competition under Section 43(a) of the Lanham Act.

This is, unfortunately, not the first time that SOLA has been forced to take action against Mobb Deep regarding the use of an infringing dragon design. Several years ago, a similar notice was sent to Mobb Deep and their record label at the time (RCA) that was met with compliance by both the group and the label. We anticipate that your clients will likewise comply with our demands that they immediately: (a) cease and desist from any and all distribution, advertisement, promotion and sales of any and all Mobb Deep and/or NOYD products bearing the dragon design trademark; (b) collect and turn over to our clients the remaining inventory of such items; (c) provide our clients with a full accounting of all sales of such items, as well as the documentation supporting such accounting as well as information regarding all advertising and promotional materials which utilize the dragon design trademark; (d) provide a copy of this letter to NOYD or NOYD's counsel and provide us with contact information for NOYD or NOYD's counsel and (e) pay SOLA damages that are not yet determined.

Should you wish to discuss this matter, please call me. If we do not hear from you by Wednesday, April 30, 2003, we will assume that you have no desire to amicably resolve this matter and will proceed accordingly. The foregoing is without prejudice to our clients' rights and remedies nothing contained herein shall be deemed a waiver of any such rights and remedies, whether at law or equity, all of which are hereby expressly reserved.

Sincerely yours,



David J. Stein

cc: Armand Majidi (via e-mail w/ exhibits)
Peter Nussbaum, Esq. (via telecopy w/ exhibits)
Jay Quatrini, Esq. (via telecopy w/ exhibits)

Exhibit A



Exhibit B

The Infamous...

MOBB DEEP

FREE AGENTS

THE MURDA MIX TAPE


APRIL 22ND


LIMITED EDITION

Includes Full Length Bonus CD
Featuring MOBB DEEP collabos with
BIG NOYD, CORMEGA, TRAGEDY KHADAFI
KOOL G RAP, INFAMOUS MOBB, LITTLES...

COMING JUNE 10TH

NOYD

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